

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT WITH DEFENDANT SOUTH AFRICAN AIRWAYS LTD.**

PLEASE TAKE NOTICE THAT, upon the Declaration of Howard J. Sedran in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant South African Airways Ltd. ("SAA"), dated July 21, 2011, along with its supporting exhibit, and the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant South African Airways Ltd., dated July 21, 2011, and all other papers and proceedings herein, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order:

- i. preliminarily approving the Settlement Agreement between Plaintiffs and SAA with an Execution Date of July 14, 2011 (the "SAA Settlement Agreement"), on the grounds that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the settlement class as defined in the SAA Settlement Agreement (the "Settlement Class");
- ii. certifying the Settlement Class for purposes of settlement only, pursuant to Federal Rule of Civil Procedure 23(c), and authorizing Plaintiffs to represent the Settlement Class;
- iii. ordering Settlement Class counsel to submit at a later date proposed notices for approval by the Court of the form of notice and the notice plan;
- iv. approving The Garden City Group as administrator of the settlement, and Citibank as escrow agent; and
- v. granting such other and further relief as may be appropriate.

Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: July 21, 2011

Robert N. Kaplan (RK-3100)
Gregory K. Arenson (GA-2426)
Jason A. Zweig (JZ-8107)
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
(212) 687-1980

Gary L. Specks (GS-8767)
KAPLAN FOX & KILSHEIMER LLP
423 Sumac Road
Highland Park, IL 60035
(847) 831-1585

By: /s/ Robert N. Kaplan

Michael D. Hausfeld
William P. Butterfield
Brent W. Landau
HAUSFELD LLP
1700 K Street, N.W., Suite 650
Washington, DC 20006
(202) 540-7200

By: /s/ Michael D. Hausfeld

Hollis L. Salzman (HS-5994)
Jay L. Himes (JH-7714)
Gregory S. Asciolla (GA-2222)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0700

By: /s/ Hollis L. Salzman

Howard J. Sedran
Austin B. Cohen
Keith J. Verrier
LEVIN, FISHBEIN, SEDRAN
& BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500

By: /s/ Howard J. Sedran

Class Counsel